

EXHIBIT A

Subject: ELECTRONIC SERVICE ONLY | Gonzalez v. ACSO, et al | Wellpath Amended Deposition Notices of Michael Lockhart

Date: Monday, September 25, 2023 at 4:12:23 PM Pacific Daylight Time

From: Stephanie Aguiniga

To: Yolanda Huang, Law Office of Yolanda Huang, THOMAS NANNEY, Thomas, Gregory B., Peters, Temitayo O., Hall, Jasper L., Lee, Tawnya, Prakash, Mrinalini V., Reitmeyer, Charles J., Wheeling, Emily Kimmelman, Kirsch, Rob, Benson, Mitch, amanda.lashner@morganlewis.com, Hasman, Ronald D., salayha.ghoury@lewisbrisbois.com

CC: Jemma Parker Saunders, Peter Bertling, Cyndi Sierra

Priority: High

Attachments: image001.jpg, d-Am Depo Ntc M. Lockhart 10-5-23 [Gonzalez].pdf

Counsel:

Attached please find Wellpath's amended deposition notice of Michael Lockhart on 10/5/23, 9:00 a.m. PST at Law Offices of Yolanda Huang, 2748 Adeline Street Suite A, Berkeley, CA 94703.

Best,
Stephanie



Stephanie S. Aguiniga | Assistant
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Attorneys for Defendant
WELLPATH MANAGEMENT, INC.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ALAMEDA COUNTY MALE PRISONERS, et al.

Plaintiffs,
v.

**ALAMEDA COUNTY SHERIFF'S
OFFICE, et al.,**

Defendants.

Case No.: 3:19-cv-07423-JSC

**DEFENDANT WELLPATH'S
AMENDED NOTICE OF
TAKING DEPOSITION OF
MICHAEL LOCKHART**

Date: OCTOBER 5, 2023

Time: 9:00 A.M. PST

Location:

**Law Offices of
Yolanda Huang
2748 Adeline Street
Suite A
Berkeley, CA 94703**

TO PLAINTIFFS AND THEIR COUNSEL OF RECORD HEREIN:

PLEASE TAKE NOTICE that Defendant WELLPATH, will take the deposition of
MICHAEL LOCKHART on **THURSDAY, OCTOBER 5, 2023, at 9:00 A.M. PST.**,
Law Offices of Yolanda Huang, 2748 Adeline Street, Suite A, Berkeley, CA 94703.

PLEASE TAKE FURTHER NOTICE that the deposing party intends to cause the proceedings to be recorded both stenographically, before a certified court reporter, and by videotape. The deposing party specifically reserves the right to use the videotape of the

1 deposition at the time of trial. Said deposition will be taken before a duly qualified
2 certified court reporter, pursuant to the provisions of Federal Rules of Civil Procedure,
3 Rule 30, and will continue until completed, or until the end of seven hours of recorded
4 testimony, pursuant to Federal Rule of Civil Procedure 30(d)(1).

5 Respectfully submitted,

6 DATED: September 25, 2023 BERTLING LAW GROUP

7 */s/ Peter G. Bertling*

8 Peter G. Bertling
9 Jemma Parker Saunders
10 Attorneys for Defendant
11 WELLPATH

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Attorneys for Defendants
WELLPATH MANAGEMENT, INC.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

ALAMEDA COUNTY MALE PRISONERS
And Former Prisoners, DANIEL GONZALEZ,
et al. on behalf of themselves and others
similarly situated, as a Class, and Subclass;
ALAMEDA COUNTY FEMALE
PRISONERS And Former Prisoners, JACLYN
MOHRBACHER, ERIN ELLIS, DOMINIQUE
JACKSON, CHRISTINA ZEPEDA, ALEXIS
WAH, AND KELSEY ERWIN, et al on behalf
of themselves and other similarly situated,

Plaintiffs.

V.

**ALAMEDA COUNTY SHERIFF'S
OFFICE**, ALAMEDA COUNTY, Deputy Joe,
Deputy Ignont (sp) Jane ROEs, Nos. 1 – 25;
WELLPATH MANAGEMENT, INC., a
Delaware Corporation (formerly known as
California Forensic Medical Group) a
corporation; its Employees and Sub-
Contractors, and Rick & Ruth ROEs Nos. 26-
50; **ARAMARK CORRECTIONAL
SERVICES, LLC**, a Delaware Limited
Liability Company; its Employees and Sub-
Contractors, and Rick & Ruth ROES Nos.
51-75.

Defendants.

Case No.: 3:19-cv-07423 JSC

CERTIFICATE OF SERVICE

Action Filed: November 12, 2019
Judge: Hon. Jacqueline Scott Corley
Ctrm: E—15th Floor

I am employed in the County of Santa Barbara, State of California. I am over the age of 18 years and not a party to the within action. My business address is 21 E. Canon Perdido Street, Suite 204B, Santa Barbara, California 93101. My e-mail address is stephanie@bertlinglawgroup.com.

On September 25, 2023, I served a true copy of the following document:

- **DEFENDANT WELLPATH'S AMENDED NOTICE OF TAKING DEPOSITION OF MICHAEL LOCKHART**

Counsel for Plaintiffs:

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Counsel for Defendants ALAMEDA COUNTY SHERIFF'S OFFICE, (ERRONEOUSLY SUED HEREIN AS "ALAMEDA COUNTY"), DEPUTY JOE, AND DEPUTY IGNONT:

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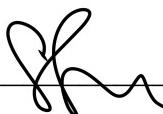
15 [X] **ELECTRONIC SERVICE**

16 Based on a court order or an agreement of the parties to accept electronic service,
17 I caused the document to be sent to the person(s) at the electronic service
address(es) above.

18 [X] **FEDERAL**

19 I declare under penalty of perjury under the laws of the United States of America
20 that the above is true and correct and that I am employed in the office of a
member of the bar of this Court at whose direction the service was made.

21 Executed on **September 25, 2023**, at Santa Barbara, California.

22
23 
24 _____
Stephanie S. Aguiniga